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February 25, 2025

Via ECF

The Honorable Jessica G.L. Clarke
United States District Judge – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Rapaport v. Epstein, 24-cv-7439-JGLC

Dear Judge Clarke:

Counsel for Defendants Pallaki, Iyer, Garrett, Weinberg, and Nelms (collectively, “Defendants”) write in response to the Court’s February 24, 2025 Order (ECF No. 49). In his February 19, 2025 letter-motion, Plaintiff Gideon Rapaport seeks an extension, until March 23, 2025, of his deadline to file the letter required by Rule 4(e) of the Court’s Individual Rules and Practices in Civil Cases. (ECF No. 47 (“I am also requesting that Your Honor toll the period for notice of an amendment of my pleading established by your Individual Practice Rule 4(e) I may make per FRCP Rule 15(a)(1)(B) so that it will end on 3/23/2025.”).) Although Plaintiff did not seek our position on this request prior to making his application, Defendants consent to the requested extension of this deadline. Once Plaintiff decides whether he will oppose the pending motions to dismiss or file an amended complaint, Defendants may, if necessary, respectfully seek an extension of any applicable deadlines, including those in Rule 4(e).

We thank the Court for its consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Steven W. Kessler

Seth L. Levine
Steven W. Kessler

Counsel for Defendant Pallaki

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/s/ Brian J. Field

Brian J. Field

*Counsel for Defendants Iyer, Garrett,
Weinberg, and Nelms*

cc: All Counsel of Record and *Pro Se* Plaintiff Gideon Rapaport (via ECF)